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**SITE SENSITIVITY VERIFICATION
AND
AGRICULTURAL COMPLIANCE STATEMENT
FOR THE PROPOSED CONSTRUCTION AND OPERATION OF
THE KARIEGA 4 WIND ENERGY FACILITY
NEAR ABERDEEN IN THE EASTERN CAPE PROVINCE**

**Report by
Johann Lanz**

17 May 2024

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EXECUTIVE SUMMARY

The key findings of this study are:

- The site has low agricultural potential predominantly because of climate constraints, but also because of soil constraints. As a result of the constraints, the site is unsuitable for crop production, and agricultural production is limited to low-capacity grazing. The land impacted by the development footprint is verified in this assessment as being of low agricultural sensitivity.
- Two potential mechanisms of negative agricultural impact were identified as occupation of land and soil erosion and degradation. Two potential mechanisms of positive agricultural impact were identified as increased financial security for farming operations, and improved security against stock theft and other crime.
- All of these are likely to have very low impact on future agricultural production potential and are therefore assessed as having very low significance.
- The amount of agricultural land loss caused by the project is well within the allowable development limits prescribed by the agricultural protocol to ensure appropriate conservation of agricultural production land. The footprint of the development is approximately eight times smaller than what the development limits allow.
- The conclusion of this assessment is that the proposed development will not have an unacceptable negative impact on the agricultural production capability of the site. The proposed development is therefore acceptable. This is substantiated by the facts that the land is of limited land capability and is not suitable for crop production, the amount of agricultural land loss is well within the allowable development limits prescribed by the agricultural protocol, and that the proposed development offers some positive impact on agriculture by way of improved financial security for farming operations and improved security against stock theft and crime, as well as wider, societal benefits.
- From an agricultural impact point of view, it is recommended that the development be approved.

1. INTRODUCTION

Environmental authorisation is being sought for the proposed construction and operation of the Kariega 4 Wind Energy Facility near Aberdeen in the Eastern Cape Province (see location in Figure 1). In terms of the National Environmental Management Act (Act No 107 of 1998 - NEMA), an application for environmental authorisation requires an agricultural assessment. In this case, based on the low to medium sensitivity of the site (see Section 7), the level of agricultural assessment required is an Agricultural Compliance Statement.



Figure 1. Locality map of the cadastral boundary of the proposed facility, north of the town of Aberdeen.

Johann Lanz was appointed as an independent agricultural specialist to conduct the agricultural assessment. The objective and focus of an agricultural assessment is to assess whether or not the proposed development will have an unacceptable agricultural impact, and based on this, to make a recommendation on whether or not it should be approved.

The purpose of the agricultural component in the environmental assessment process is to preserve the agricultural production potential, particularly of scarce arable land, by ensuring that development does not exclude existing or potential agricultural production from such land or impact it to the extent that its future production potential is reduced. However, in this case, the small extent

of land loss and its lack of crop production potential means that there is an insignificant effect on the agricultural production potential of the site.

2. PROJECT DESCRIPTION

The proposed facility will consist of the standard infrastructure of a wind energy facility including, up to 50 turbines with foundations; crane pads per turbine; cabling; battery storage; auxiliary buildings; access and internal roads; on-site substation; temporary construction laydown areas and will have a total generating capacity of up to 500 MW. The grid connection infrastructure is subject to a separate assessment and EA.

What is relevant for agricultural impact in a wind energy facility layout is the extent of the total agricultural footprint – that is the small but widely distributed footprint of land on which agriculture is actually excluded. The largest components of this footprint are the crane pads and the roads. The identification of individual components within this footprint is irrelevant to agricultural impact because all components have the same impact, namely occupation of agricultural land. Therefore, it is simply the location of the total footprint that matters. In a low and largely uniform agricultural potential environment like the one being assessed, the exact location and layout of the facility infrastructure across the landscape actually has no real bearing on the significance of the agricultural impacts. The agricultural footprint of the facility is shown in Figure 2.

3. TERMS OF REFERENCE

The terms of reference for this study is to fulfill the requirements of the *Protocol for the specialist assessment and minimum report content requirements of environmental impacts on agricultural resources by onshore wind and/or solar photovoltaic energy generation facilities where the electricity output is 20 megawatts or more*, gazetted on 20 March 2020 in GN 320 (in terms of Sections 24(5)(A) and (H) and 44 of NEMA, 1998).

The verified agricultural sensitivity of the site is less than high. The level of agricultural assessment required in terms of the protocol for sites verified as less than high sensitivity is an Agricultural Compliance Statement.

The terms of reference for such an assessment, as stipulated in the agricultural protocol, are listed below, and the section number of this report which fulfils each stipulation is given after it in brackets.

1. The Agricultural Compliance Statement must be prepared by a soil scientist or agricultural specialist registered with the South African Council for Natural Scientific Professions (SACNASP) (**Appendix 3**).
2. The compliance statement must:
 1. be applicable to the preferred site and proposed development footprint;

2. confirm that the site is of “low” or “medium” sensitivity for agriculture (**Section 7**); and
3. indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site (**Section 10**).
3. The Agricultural Compliance Statement must contain, as a minimum, the following information:
 1. details and relevant experience as well as the SACNASP registration number of the soil scientist or agricultural specialist preparing the statement including a curriculum vitae (**Appendix 1**);
 2. a signed statement of independence by the specialist (**Appendix 2**);
 3. a map showing the proposed development footprint (including supporting infrastructure) with a 50 m buffered development envelope, overlaid on the agricultural sensitivity map generated by the screening tool (**Figure 2**);
 4. calculations of the physical development footprint area for each land parcel as well as the total physical development footprint area of the proposed development including supporting infrastructure (**Section 9.9**);
 5. confirmation that the development footprint is in line with the allowable development limits contained in Table 1 of the protocol (**Section 9.9**);
 6. confirmation from the specialist that all reasonable measures have been taken through micro-siting to avoid or minimize fragmentation and disturbance of agricultural activities (**Section 9.7**);
 7. a substantiated statement from the soil scientist or agricultural specialist on the acceptability, or not, of the proposed development and a recommendation on the approval, or not of the proposed development (**Section 10**);
 8. any conditions to which this statement is subjected (**Section 10**);
 9. in the case of a linear activity, confirmation from the agricultural specialist or soil scientist, that in their opinion, based on the mitigation and remedial measures proposed, the land can be returned to the current state within two years of completion of the construction phase (**Section 9.8**);
 10. where required, proposed impact management outcomes or any monitoring requirements for inclusion in the EMPr (**Section 9.10**); and
 11. a description of the assumptions made and any uncertainties or gaps in knowledge or data (**Section 5**).

4. METHODOLOGY OF STUDY

The assessment was based on a verification of current agricultural land use on the site and was informed by existing climate, soil and agricultural potential data for the site (see references). The level of agricultural assessment is considered entirely adequate for an understanding of on-site agricultural production potential for the purposes of this assessment.

5. ASSUMPTIONS, UNCERTAINTIES OR GAPS IN KNOWLEDGE OR DATA

There are no specific assumptions, uncertainties or gaps in knowledge or data that affect the findings of this study.

6. APPLICABLE LEGISLATION AND PERMIT REQUIREMENTS

A renewable energy facility requires approval from the National Department of Agriculture, Land Reform and Rural Development (DALRRD) if the facility is on agriculturally zoned land. There are two approvals that apply. The first is a No Objection Letter for the change in land use. This letter is one of the requirements for receiving municipal rezoning. It is advisable to apply for this as early in the development process as possible because not receiving this DALRRD approval is a fatal flaw for a project. Note that a positive EA does not assure DALRRD's approval of this. This application requires a motivation backed by good evidence that the development is acceptable in terms of its impact on the agricultural production potential of the development site. This assessment report will serve that purpose.

The second required approval is a consent for long-term lease in terms of the Subdivision of Agricultural Land Act (Act 70 of 1970) (SALA). If DALRRD approval for the development has already been obtained in the form of the No Objection letter, then SALA approval should not present any difficulties. Note that SALA approval is not required if the lease is over the entire farm portion. SALA approval (if required) can only be applied for once the Municipal Rezoning Certificate and Environmental Authorisation has been obtained.

Rehabilitation after disturbance to agricultural land is managed by the Conservation of Agricultural Resources Act (Act 43 of 1983) (CARA). A consent in terms of CARA is required for the cultivation of virgin land. Cultivation is defined in CARA as "any act by means of which the topsoil is disturbed mechanically". The purpose of this consent for the cultivation of virgin land is to ensure that only land that is suitable as arable land is cultivated. Therefore, despite the above definition of cultivation, disturbance to the topsoil that results from the construction of a renewable energy facility and its associated infrastructure does not constitute cultivation as it is understood in CARA. This has been corroborated by Anneliza Collett (Acting Scientific Manager: Natural Resources Inventories and Assessments in the Directorate: Land and Soil Management of the Department of Agriculture, Land Reform and Rural Development (DALRRD)). The construction and operation of the facility will therefore not require consent from the Department of Agriculture, Land Reform and Rural Development in terms of this provision of CARA.

7. SITE SENSITIVITY VERIFICATION

In terms of the gazetted agricultural protocol, a site sensitivity verification must be submitted that:

1. confirms or disputes the current use of the land and the environmental sensitivity as identified by the screening tool, such as new developments or infrastructure, the change in vegetation cover or status etc.;
2. contains a motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity.

Agricultural sensitivity is a direct function of the capability of the land for agricultural production. All arable land that can support viable crop production, is classified as high (or very high) sensitivity. This is because there is a scarcity of arable production land in South Africa and its conservation for agricultural use is therefore a priority. Land which cannot support viable crop production is much less of a priority to conserve for agricultural use, and is rated as medium or low agricultural sensitivity.

The screening tool classifies agricultural sensitivity according to only two independent criteria – the land capability rating and whether the land is used for cropland or not. All cropland is classified as at least high sensitivity, based on the logic that if it is under crop production, it is indeed suitable for it, irrespective of its land capability rating.

The screening tool sensitivity categories in terms of land capability are based upon the Department of Agriculture's updated and refined, country-wide land capability mapping, released in 2016. The data is generated by GIS modelling. Land capability is defined as the combination of soil, climate and terrain suitability factors for supporting rain fed agricultural production. It is an indication of what level and type of agricultural production can sustainably be achieved on any land, based on its soil, climate and terrain. The higher land capability values (≥ 8 to 15) are likely to be suitable as arable land for crop production, while lower values are only likely to be suitable as non-arable grazing land. The direct relationship between land capability and agricultural sensitivity is shown in Table 1.

Table 1. Relationship between land capability and agricultural sensitivity as given by the screening tool.

Land capability value	Agricultural sensitivity
1 - 5	low
6 - 8	medium
9 - 10	high
11 - 15	very high

The classified land capability of the site is predominantly 6, but ranges from 2 to 8. The small scale

differences in the modelled land capability across the project area are not very accurate or significant at this scale and are more a function of how the data is generated by modelling, than actual meaningful differences in agricultural potential on the ground. There is little real difference between low and medium agricultural sensitivity on the ground.

The classification of some isolated patches within the site as high agricultural sensitivity (red in Figure 2) is because those parts are classified as cropland in the data set used by the screening tool. However that data set is outdated. All land across the site is no longer used as cropland and has not been cropped in the last twenty years according to the historical imagery available on Google Earth. It should not therefore still be classified as high agricultural sensitivity.

The fact that previously cropped lands are no longer viable for cropping is not because the soil has changed but because the suitability for cropping changes with a changing agricultural economy. Poorer soils or marginal climates that may have been cropped with economic viability in the past, are abandoned as cropland because they become too marginal for viable crop production in a more challenging agricultural economy with higher input costs. Climate change and changes in rainfall patterns have also lead to the increasing marginality of agricultural lands.

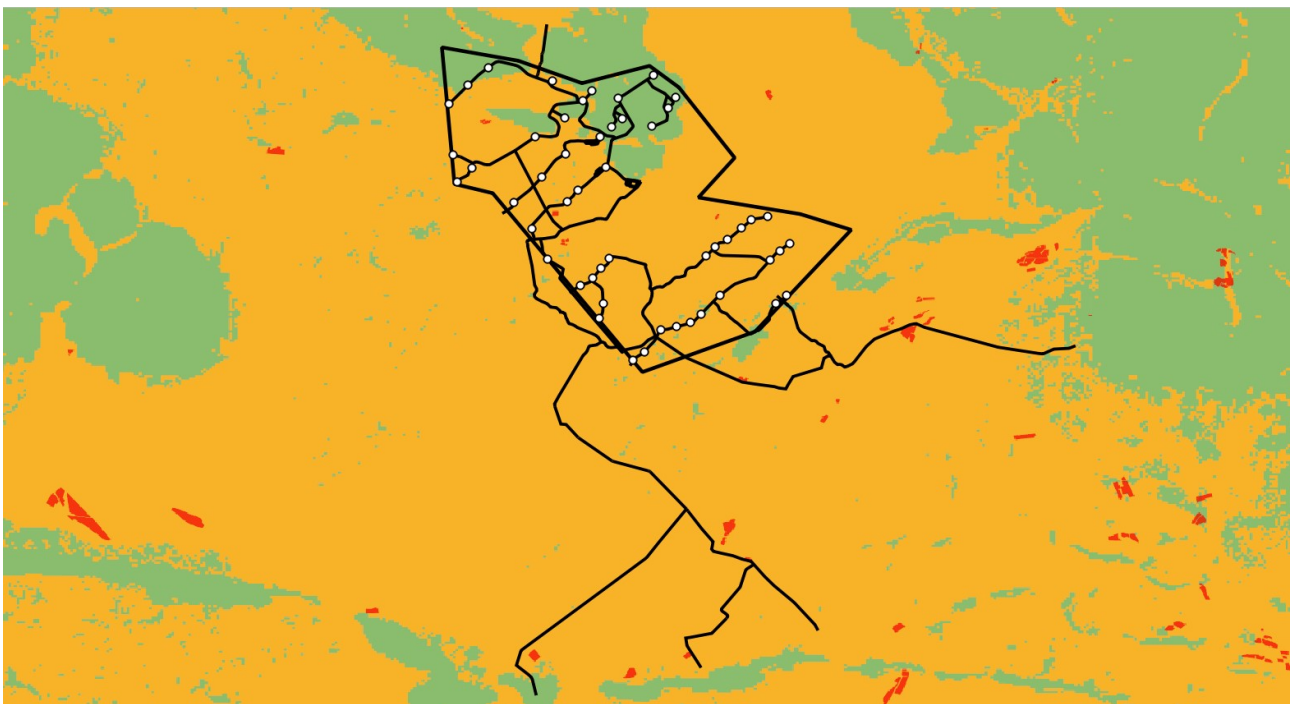


Figure 2. The proposed layout of the facility overlaid on agricultural sensitivity, as given by the screening tool (green = low; yellow = medium; red = high).

This site sensitivity verification has assessed the site as being of low to medium agricultural sensitivity based on its crop status and agricultural production potential (see Section 8). The required level of agricultural assessment is therefore confirmed as an Agricultural Compliance Statement.

8. BASELINE DESCRIPTION OF THE AGRO-ECOSYSTEM

The arid climate (low rainfall of approximately 211 to 223 mm per annum and high evaporation of approximately 1,446 to 1,501 mm per annum) (Schulze, 2009) is the limiting factor for land capability, regardless of the soil capability and terrain. Moisture availability is very limiting to any kind of agricultural production, including grazing. This has been exacerbated by recent droughts. Because climate is the limiting factor that controls production potential, it is the only aspect of the agro-ecosystem description that is required for assessing the agricultural impact of this development. All other agricultural potential parameters become irrelevant under the dominant limitation of aridity.

The farm is located in a sheep farming agricultural region. Grazing (angora goats plus some sheep and game) is the dominant agricultural land use on the site and surrounds. Grazing capacity of the site is low at 24 hectares per large stock unit (DAFF, 2018).

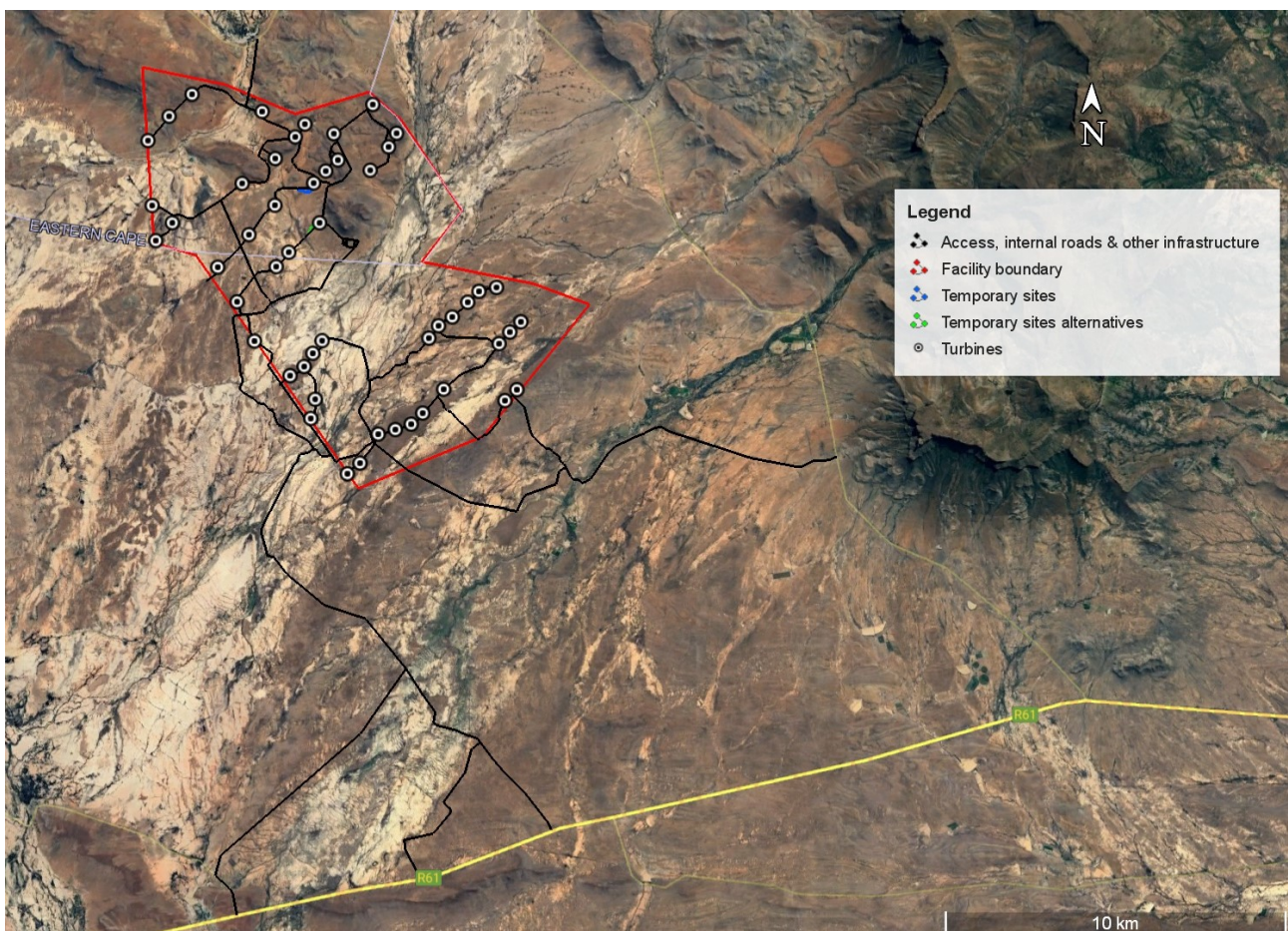


Figure 3. Satellite image map of the development.

9. ASSESSMENT OF AGRICULTURAL IMPACT

9.1 WHAT CONSTITUTES AN AGRICULTURAL IMPACT?

An agricultural impact is a temporary or permanent change to the future production potential of land. The significance of the agricultural impact is directly proportional to the extent of the change in production potential. If a development will not change the future production potential of the land, then there is no agricultural impact. A decrease in future production potential is a negative impact and an increase is a positive impact.

9.2 THE SIGNIFICANCE OF AGRICULTURAL IMPACT AND THE FACTORS THAT DETERMINE IT

When the agricultural impact of a development involves the permanent or long term non-agricultural use of potential agricultural land, as it does in this case, the focus and defining question of the agricultural impact assessment is:

Does the loss of future agricultural production potential that will result from this development, justify keeping the land solely for potential agricultural production and therefore not approving the development?

If the loss is small, then it is unlikely to justify non approval. If the loss is big, then it is likely to justify it.

The extent of the loss is a direct function of two things, firstly the amount of land that will be lost and secondly, the production potential of the land that will be lost. In the case of wind farms, the first factor, amount of land loss, is so small that the total extent of the loss of future agricultural production potential is insignificantly small, regardless of how much production potential the land has. This is because the required spacing between turbines means that the amount of land actually excluded from agricultural use is extremely small in relation to the surface area over which a wind farm is distributed. Wind farm infrastructure (including all associated infrastructure and roads) typically occupies less than 2% of the surface area, according to the typical surface area requirements of wind farms in South Africa (DFFE, 2015). Most wind energy facilities, for which I have recently done assessments, occupy less than 1% of the surface area. All agricultural activities are able to continue unaffectedly on all parts of the farmland other than this small agricultural footprint and the actual loss of production potential is therefore insignificant.

In this case, the second factor, the production potential of the land, is also low which means that the loss of future agricultural production potential as a result of the proposed development is insignificant.

It is also important to note that renewable energy facilities have both positive and negative effects on the production potential of land (see Section 9.3) and so it is the net sum of these positive and negative effects that determines the extent of the change in future production potential. The significance of the small loss of production potential is reduced even more because it is compensated by the positive impacts that enhance production potential.

Another aspect to consider is the scale at which the significance of the agricultural impact is assessed. The change in production potential of a farm or significant part of a farm is likely to be highly significant at the scale of that farm but may be much less so at larger scales. This assessment considers a regional and national scale to be the most appropriate one for assessing the significance of the loss of agricultural production potential because, as has been discussed above, the purpose is to ensure the conservation of agricultural land required for national food security.

9.3 IMPACT IDENTIFICATION AND DISCUSSION

There is ultimately only ever a single agricultural impact of a development and that is a change to the future agricultural production potential of the land. This impact occurs by way of different mechanisms some of which lead to a decrease in production potential and some of which lead to an increase. It is the net sum of positive and negative effects that determines the overall agricultural impact.

Two direct mechanisms have been identified that lead to decreased agricultural potential by:

1. **occupation of land** - Agricultural land directly occupied by the development infrastructure will become restricted for agricultural use, with consequent potential loss of agricultural productivity for the duration of the project lifetime. As discussed above, the small and widely distributed nature of the agricultural footprint of the facility means that only an insignificant proportion of the available agricultural land is impacted in this way.
2. **soil erosion and degradation** – Erosion can occur as a result of the alteration of the land surface run-off characteristics, predominantly through the establishment of hard surface areas including roads. Loss of topsoil can result from poor topsoil management during construction related excavations. Soil erosion and loss of topsoil are completely preventable. The stormwater management that will be an inherent part of the engineering on site and standard, best-practice erosion control and topsoil management measures recommended and included in the Environmental Management Programme (EMPr), are likely to be effective in preventing soil erosion and loss of topsoil.

Two indirect mechanisms have been identified that lead to increased agricultural potential through:

1. **increased financial security for farming operations** – Reliable and predictable income will be generated by the farming enterprises through the lease of the land to the energy facility.

This is likely to increase their cash flow and financial security and could improve farming operations and productivity through increased investment into farming.

2. **improved security against stock theft and other crime** due to the presence of security infrastructure and security personnel at the energy facility.

Considering what is detailed in Section 9.2 above, the extent to which any of these mechanisms is likely to actually affect levels of agricultural production is small and the overall impact of a change in agricultural production potential is therefore small.

9.4 CUMULATIVE IMPACTS

The cumulative impact of a development is the impact that development will have when its impact is added to the incremental impacts of other past, present or reasonably foreseeable future activities that will affect the same environment.

The most important concept related to a cumulative impact is that of an acceptable level of change to an environment. A cumulative impact only becomes relevant when the impact of the proposed development will lead directly to the sum of impacts of all developments causing an acceptable level of change to be exceeded in the surrounding area. If the impact of the development being assessed does not cause that level to be exceeded, then the cumulative impact associated with that development is not significant.

The potential cumulative agricultural impact of importance is a regional loss (including by degradation) of future agricultural production potential. The defining question for assessing the cumulative agricultural impact is this:

What loss of future agricultural production potential is acceptable in the area, and will the loss associated with the proposed development, when considered in the context of all past, present or reasonably foreseeable future impacts, cause that level in the area to be exceeded?

Department of Forestry, Fisheries and the Environment (DFFE) requires compliance with a specified methodology for the assessment of cumulative impacts. This is positive in that it ensures engagement with the important issue of cumulative impacts. However, the required compliance has some limitations and can, in the opinion of the author, result in an over-focus on methodological compliance, while missing the more important task of effectively answering the above defining question.

listed in Appendix 4 (total generation capacity of 4013 MW) will amount to a total of approximately

1248 hectares. This is calculated using the industry standards of 2.5 and 0.3 hectares per megawatt for solar and wind energy generation respectively, as per the Department of Environmental Affairs (DEA) Phase 1 Wind and Solar Strategic Environmental Assessment (SEA) (2015). As a proportion of the total area within a 30 km radius (approximately 282,700 ha), this amounts to only 0.44% of the surface area. This is well within an acceptable limit in terms of loss of low potential agricultural land, which is only suitable for grazing, and of which there is no scarcity in the country. This is particularly so when considered within the context of the following point.

For South Africa to develop the renewable energy generation that it urgently needs, agriculturally zoned land will need to be used for renewable energy generation. It is preferable to incur a cumulative loss of agricultural land in a region such as the one being assessed, which has no crop production potential, and low grazing capacity, then to lose agricultural land that has a higher potential, and that is much scarcer, to renewable energy development elsewhere in the country.

All the projects contributing to cumulative impact for this assessment have the same agricultural impacts in a very similar agricultural environment, and therefore the same mitigation measures apply to all.

It should be noted that there are few land uses, other than renewable energy, that are competing for agricultural land use in this area. The cumulative impact from developments, other than renewable energy, is therefore likely to be low.

The loss of agricultural potential by soil degradation can effectively be prevented for renewable energy developments by generic mitigation measures that are all inherent in the project engineering and/or are standard, best-practice for construction sites. Soil degradation does not therefore pose a cumulative impact risk.

Due to all the considerations discussed above, the cumulative impact of loss of future agricultural production potential is assessed as low. It will not have an unacceptable negative impact on the agricultural production capability of the area, and it is therefore recommended.

9.5 IMPACTS OF THE NO-GO ALTERNATIVE

The no-go alternative considers impacts that will occur to the agricultural environment in the absence of the proposed development. The one identified potential impact is that due to irregular rainfall, which is likely to be exacerbated by climate change, agriculture in the area will come under increased pressure in terms of economic viability.

The development compliments agriculture by providing an additional income source, without

excluding agriculture from the land, or decreasing production. Therefore, the negative agricultural impact of the no-go alternative is more significant than that of the development, and so, purely from an agricultural impact perspective, the proposed development is the preferred alternative between the development and the no-go. In addition, the no-go option would prevent the proposed development from contributing to the environmental, social and economic benefits associated with the development of renewable energy in South Africa.

9.6 COMPARATIVE ASSESSMENT OF ALTERNATIVES

Due to the low agricultural sensitivity of the site, and the effectively uniform agricultural conditions across the site, there will be absolutely no material difference between the agricultural impacts of any layout alternatives. Technology alternatives will also make absolutely no material difference to the significance of the agricultural impacts.

9.7 MICRO-SITING

The agricultural protocol requires confirmation that all reasonable measures have been taken through micro-siting to minimize fragmentation and disturbance of agricultural activities. As long as the agricultural footprint avoids all areas used for crop production, the exact position of the footprint and all infrastructure within it will not make any material difference to agricultural impacts and disturbance.

9.8 CONFIRMATION OF LINEAR ACTIVITY IMPACT

The protocol requires confirmation, in the case of a linear activity, that the land can be returned to the current state within two years of completion of the construction phase. This is not relevant in this case because the proposed development is not a linear one.

9.9 IMPACT FOOTPRINT

The agricultural protocol stipulates allowable development limits for renewable energy developments of > 20 MW. Allowable development limits refer to the area of a particular agricultural sensitivity category that can be directly impacted (i.e. taken up by the physical footprint) by a renewable energy development. The agricultural footprint is defined in the protocol as the area that is directly occupied by all infrastructures, including roads, hard standing areas, buildings etc., that are associated with the renewable energy facility during its operational phase, and that result in the exclusion of that land from potential cultivation or grazing. It excludes all areas that were already occupied by roads and other infrastructure prior to the establishment of the energy facility but includes the surface area required for expanding existing infrastructure (e.g. widening existing roads). It therefore represents the total land that is actually excluded from agricultural use as a result

of the renewable energy facility.

The allowable development limit on land of low and medium agricultural sensitivity with a land capability of < 8, as this site has been verified to be, is 2.5 ha per MW. This would allow the proposed facility of 500 MW to occupy an agricultural footprint of $500 \times 2.5 = 1250$ hectares. The wind facility being assessed will occupy an agricultural footprint of 264.7 hectares. It is therefore confirmed that the agricultural footprint of this development will be well within the allowable limit. It will in fact be more than six times smaller than what the development limits allow.

9.10 MITIGATION MEASURES

Generic mitigation measures that are effective in preventing soil degradation are all inherent in the project engineering and/or are standard, best-practice for construction sites.

- A system of storm water management, which will prevent erosion, will be an inherent part of the road engineering on site. Any occurrences of erosion must be attended to immediately and the integrity of the erosion control system at that point must be amended to prevent further erosion from occurring there.
- Any excavations done during the construction phase, in areas that will be re-vegetated at the end of the construction phase, must separate the upper 30 cm of topsoil from the rest of the excavation spoils and store it in a separate stockpile. When the excavation is back-filled, the topsoil must be back-filled last, so that it is at the surface. Topsoil should only be stripped in areas that are excavated. Across the majority of the site, including construction lay down areas, it will be much more effective for rehabilitation, to retain the topsoil in place. If levelling requires significant cutting, topsoil should be temporarily stockpiled and then re-spread after cutting, so that there is a covering of topsoil over the entire surface.

9.11 IMPACT ASSESSMENT

An Agricultural Compliance Statement is not required to formally rate agricultural impacts. It is only required to indicate whether or not the proposed development will have an unacceptable impact on the agricultural production capability of the site.

Nevertheless, it is hereby confirmed that the significance of the agricultural impact of the proposed development is very low.

10. CONCLUSIONS

The site has low agricultural potential predominantly because of climate constraints, but also

because of soil constraints. As a result of the constraints, the site is unsuitable for crop production, and agricultural production is limited to low capacity grazing. The land impacted by the development footprint is verified in this assessment as being of low agricultural sensitivity.

Two potential mechanisms of negative agricultural impact were identified as occupation of land and soil erosion and degradation. Two potential mechanisms of positive agricultural impact were identified as increased financial security for farming operations, and improved security against stock theft and other crime. All of these are likely to have very low impact on future agricultural production potential and are therefore assessed as having very low significance.

The amount of agricultural land loss caused by the project is well within the allowable development limits prescribed by the agricultural protocol to ensure appropriate conservation of agricultural production land. The footprint of the development is approximately eight times smaller than what the development limits allow.

The conclusion of this assessment is that the proposed development will not have an unacceptable negative impact on the agricultural production capability of the site. The proposed development is therefore acceptable. This is substantiated by the facts that the land is of limited land capability and is not suitable for crop production, the amount of agricultural land loss is well within the allowable development limits prescribed by the agricultural protocol, and that the proposed development offers some positive impact on agriculture by way of improved financial security for farming operations and improved security against stock theft and crime, as well as wider, societal benefits.

From an agricultural impact point of view, it is recommended that the development be approved.

The conclusion of this assessment on the acceptability of the proposed development and the recommendation for its approval is not subject to any conditions, other than recommended mitigation.

11. REFERENCES

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APPENDIX 1: SPECIALIST CURRICULUM VITAE

Johann Lanz Curriculum Vitae

Education

M.Sc. (Environmental Geochemistry)	University of Cape Town	1996 - 1997
B.Sc. Agriculture (Soil Science, Chemistry)	University of Stellenbosch	1992 - 1995
BA (English, Environmental & Geographical Science)	University of Cape Town	1989 - 1991
Matric Exemption	Wynberg Boy's High School	1983

Professional work experience

I have been registered as a Professional Natural Scientist (Pri.Sci.Nat.) in the field of soil science since 2012 (registration number 400268/12) and am a member of the Soil Science Society of South Africa.

Soil & Agricultural Consulting Self employed 2002 - present

Within the past 5 years of running my soil and agricultural consulting business, I have completed more than 170 agricultural assessments (EIAs, SEAs, EMPRs) in all 9 provinces for renewable energy, mining, electrical grid infrastructure, urban, and agricultural developments. I was the appointed agricultural specialist for the nation-wide SEAs for wind and solar PV developments, electrical grid infrastructure, and gas pipelines. My regular clients include: Zutari; CSIR; SiVEST; SLR; WSP; Arcus; SRK; Environamics; Royal Haskoning DHV; ABO; Enertrag; WKN-Windcurrent; JG Afrika; Mainstream; Redcap; G7; Mulilo; and Tiptrans. Recent agricultural clients for soil resource evaluations and mapping include Cederberg Wines; Western Cape Department of Agriculture; Vogelfontein Citrus; De Grendel Estate; Zewenwacht Wine Estate; and Goedgedacht Olives. In 2018 I completed a ground-breaking case study that measured the agricultural impact of existing wind farms in the Eastern Cape.

Soil Science Consultant Agricultural Consultants International (Tinie du Preez) 1998 - 2001

Responsible for providing all aspects of a soil science technical consulting service directly to clients in the wine, fruit and environmental industries all over South Africa, and in Chile, South America.

Contracting Soil Scientist De Beers Namaqualand Mines July 1997 - Jan 1998

Completed a contract to advise soil rehabilitation and re-vegetation of mined areas.

Publications

- Lanz, J. 2012. Soil health: sustaining Stellenbosch's roots. In: M Swilling, B Sebitosi & R Loots (eds). *Sustainable Stellenbosch: opening dialogues*. Stellenbosch: SunMedia.
- Lanz, J. 2010. Soil health indicators: physical and chemical. *South African Fruit Journal*, April / May 2010 issue.
- Lanz, J. 2009. Soil health constraints. *South African Fruit Journal*, August / September 2009 issue.
- Lanz, J. 2009. Soil carbon research. *AgriProbe*, Department of Agriculture.
- Lanz, J. 2005. Special Report: Soils and wine quality. *Wineland Magazine*.



forestry, fisheries & the environment

Department:
Forestry, Fisheries and the Environment
REPUBLIC OF SOUTH AFRICA

Private Bag X447, Pretoria, 0001, Environment House, 473 Steve Biko Road, Pretoria, 0002 Tel: +27 12 399 9000, Fax: +27 86 625 1042

APPENDIX 2: SPECIALIST DECLARATION FORM AUGUST 2023

Specialist Declaration form for assessments undertaken for application for authorisation in terms of the National Environmental Management Act, Act No. 107 of 1998, as amended and the Environmental Impact Assessment (EIA) Regulations, 2014, as amended (the Regulations)

REPORT TITLE: THE PROPOSED CONSTRUCTION AND OPERATION OF THE KARIEGA 4 WIND ENERGY FACILITY NEAR ABERDEEN IN THE EASTERN CAPE PROVINCE

Kindly note the following:

1. This form must always be used for assessment that are in support of applications that must be subjected to Basic Assessment or Scoping & Environmental Impact Reporting, where this Department is the Competent Authority.
2. This form is current as of August 2023. It is the responsibility of the Applicant / Environmental Assessment Practitioner (EAP) to ascertain whether subsequent versions of the form have been published or produced by the Competent Authority. The latest available Departmental templates are available at <https://www.dffe.gov.za/documents/forms>.
3. An electronic copy of the signed declaration form must be appended to all Draft and Final Reports submitted to the department for consideration.
4. The specialist must be aware of and comply with 'the Procedures for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the act, when applying for environmental authorisation - GN 320/2020', where applicable.

1. SPECIALIST INFORMATION

Title of Specialist Assessment	Agricultural Assessment
Specialist Company Name	SoilZA (sole proprietor)
Specialist Name	Johann Lanz
Specialist Identity Number	6607045174089
Specialist Qualifications:	M.Sc. (Environmental Geochemistry)
Professional affiliation/registration:	Registered Professional Natural Scientist (Pr.Sci.Nat.) Reg. no. 400268/12 Member of the Soil Science Society of South Africa
Physical address:	1a Wolfe Street, Wynberg, Cape Town, 7800
Postal address:	1a Wolfe Street, Wynberg, Cape Town, 7800
Telephone	Not applicable
Cell phone	+27 82 927 9018
E-mail	johann@soilza.co.za

2. DECLARATION BY THE SPECIALIST

I, **Johann Lanz** declare that –

- I act as the independent specialist in this application;
- I am aware of the procedures and requirements for the assessment and minimum criteria for reporting on identified environmental themes in terms of sections 24(5)(a) and (h) and 44 of the National Environmental Management Act (NEMA), 1998, as amended, when applying for environmental authorisation which were promulgated in Government Notice No. 320 of 20 March 2020 (i.e. “the Protocols”) and in Government Notice No. 1150 of 30 October 2020.
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing –
 - any decision to be taken with respect to the application by the competent authority; and;
 - the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the NEMA Act.



Signature of the Specialist

SoilZA (sole proprietor)

Name of Company:

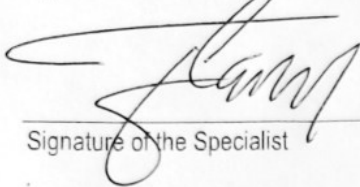
16 April 2024

Date

SPECIALIST DECLARATION FORM – AUGUST 2023

3. UNDERTAKING UNDER OATH/ AFFIRMATION

I, **Johann Lanz**, swear under oath that all the information submitted or to be submitted for the purposes of this application is true and correct.



Signature of the Specialist

SoilZA – sole proprietor

Name of Company

16 April 2024

Date

 70269103
SF

Signature of the Commissioner of Oaths

2024/04/16

Date



SACNASP

South African Council for Natural Scientific Professions

herewith certifies that

Johan Lanz

Registration Number: 400268/12

is a registered scientist

in terms of section 20(3) of the Natural Scientific Professions Act, 2003
(Act 27 of 2003)

in the following field(s) of practice (Schedule 1 of the Act)

Soil Science (Professional Natural Scientist)

Effective **15 August 2012**

Expires **31 March 2025**



Chairperson

Chief Executive Officer



APPENDIX 4: PROJECTS INCLUDED IN CUMULATIVE IMPACT ASSESSMENT

Table 1: Table of all projects that were included in the cumulative impact assessment.

DFFE Reference	Project name	Technology	Capacity (MW)
	Kariega WEF 1	WEF	500
	Kariega WEF 2	WEF	560
	Kariega WEF 3	WEF	500
	Kariega WEF 4	WEF	500
12/12/20/2015	Proposed Poortjie Wes Wind Energy Project	WEF	363
12/12/20/2211	Aberdeen 200MW wind farm	WEF	200
14/12/16/3/3/1/552	Aberdeen Pv/Cpv Solar Energy Facility (Up To 20mw)	SEF	20 ##
14/12/16/3/3/2/756	Camdeboo Wind Energy Facility	WEF	350
12/12/20/2535	Mainstream Aberdeen wind energy facility,	WEF	100 ##
14/12/16/3/3/1/2722	Aberdeen 1 Wind Farm	WEF	240
14/12/16/3/3/1/2723	Aberdeen 2 Wind Farm	WEF	240
14/12/16/3/3/1/2724	Aberdeen 3 Wind Farm	WEF	240
14/12/16/3/3/1/2851	FE Kudu Wind Farm	WEF	100 ##
14/12/16/3/3/1/2835	FE Tango Wind Farm	WEF	100 ##
Total solar			20 MW
Total wind			3993 MW
Total			4013 MW

(Values containing “##” = an average estimation of MW capacity for a REF; Specific values are not yet available for these projects and are subject to change)

Note: Electrical grid infrastructure projects do not contribute to a loss of agricultural and are not therefore included in this table and in the calculation of cumulative land loss.